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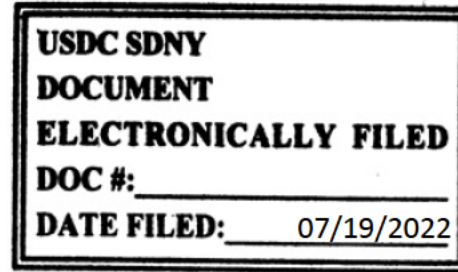
Tibor L. Nagy

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June 30, 2022

VIA ECF

The Honorable Stewart D. Aaron
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007



Re: Allianz Global Investors GmbH, et al. v. Bank of America Corporation, et al., Case No. 1:18-cv-10364 (S.D.N.Y. 2018)

Dear Judge Aaron,

Pursuant to Section II.B.3 of the Court's Individual Practices, and Sections 5.3 and 5.5 of the Stipulation and Second Amended Order of Confidentiality (ECF 767) (the "Protective Order"), we write to seek leave to file under seal Defendants' reply letter in further support of their letter motion challenging BlackRock's assertion of privilege over certain documents. *See* ECF 1111 (Defendants' Letter Motion); 1129 (Order re: Briefing Schedule); 1131 (Plaintiffs' Letter in Opposition). The forthcoming reply letter should be sealed for substantially the same reasons set forth in (i) Defendants' sealing request for the opening letter (ECF 1110) and (ii) Plaintiffs' sealing request for their opposition letter (ECF 1130). The reply discusses the same exhibits subject to BlackRock's assertions of privilege that were included with the prior letters.

For the foregoing reasons, we respectfully request that Defendants' forthcoming reply concerning the parties' privilege dispute remain under seal.

Respectfully,

Request GRANTED. The proposed sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information.

See Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 119-20 (2d Cir. 2006). SO ORDERED.

Dated: July 19, 2022



/s/ Tibor L. Nagy, Jr.

Tibor L. Nagy, Jr.

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cc: All counsel of record (via ECF)